

From: jeff taylor [REDACTED]
Sent: 12 April 2016 00:21
To: Glyn Rhonwy Pumped Storage Scheme
Subject: WRITTEN REPRESENTATION REGARDING THE ISSUE OF WATER DISCHARGE and ENVIRONMENTAL QUALITY

Glyn Rhonwy Pumped Storage EN010072
WRITTEN REPRESENTATION REGARDING THE ISSUE OF WATER MONITORING and ENVIRONMENTAL QUALITY
11th April 2016
FROM JEFF TAYLOR ON BEHALF OF THE GROUP “CONCERNED ABOUT GLYNRHONWY”
Reference number: 10031989

Dear Mr Cowperthwaite

please find attached my Written Representation regarding Water Discharge and Environmental Quality

as it is >1500 words please find below a shorter summary

Yours Faithfully
Jeff Taylor

SUMMARY

The quality of water discharges is clearly crucial for the aquatic environment downstream on both upper and lower sides of the scheme, the recreational use of the locality and its attendant socio-economic benefits, and the status of Llyn Padarn as a SSSI with Good bathing water status.

The Developer's assessment of environmental effects of water discharged by the proposed project is based on an inadequate sampling regime which grossly underestimates the potential effects of contamination resulting from the site's history as a dump for chemical and conventional weapons, and industrial and domestic waste both legal and illegal.

I believe that a far greater effort to research and define the water quality of the upper and lower quarry ponds is required before proceeding with this development

The pondwaters, particularly in Q6 are likely to be highly contaminated by dumped chemical and conventional weapons ... this is now supported by a large amount of documentation recently discovered in the public domain... *see my submission regarding the issue of munitions*

- I think that any effluent should be pumped into alternating holding tanks/ponds and each one separately tested fully for contaminants as above before being released. Such complex analysis will not be instantaneous and once contaminated water has been discharged it will be too late, so a batch collection monitoring and discharge arrangement is essential. Such an arrangement may require a considerable amount of re-design of the project.

Quality control of such discharges is critically dependent on any monitoring regime imposed by the regulatory

authorities. This may be have to be severe if it is to be effective. This may not be achievable in practice and, given the likely cost, is unlikely to be successful if self-regulation by the Developer is involved.

The Ministry of Defence has pointedly *NOT* certified the site to be cleared of munitions (Q6), in spite of their efforts to achieve even the partial clearance they did manage in the seventies. But the developer has understated the challenge of addressing this issue and it may be beyond the resources anyone but national government.

I believe the only way to ensure no detrimental effect to the local environment from water discharges from this scheme is to properly remediate the site with regard to munitions and other waste dumping, prior to reworking it for any development